

Witness: Richard A. Soderman
Request from: Attorney General

Question:

Please provide the following documents:

- (a) Provide copies of the non-binding bids submitted in Round One of the sale process.
- (b) Provide copies of the analyses, assessments, evaluations, studies, correspondence and other documentation prepared by or for J.P. Morgan as part of its review of the Round One bids.
- (c) Provide copies of the notes, minutes, summaries, and reports of the meetings at which J.P. Morgan reviewed the Round One bids. Also provide copies of the presentations made at and the documents circulated or distributed at any of these meetings.
- (d) Provide copies of any documents in the possession of J.P. Morgan or Mr. Finnegan related to the due diligence reviews conducted by the bidders in Round Two of the sale process.
- (e) Provide copies of the binding bids submitted in Round Two of the sale process.
- (f) Provide copies of the analyses, assessments, evaluations, studies, correspondence and other documentation prepared by or for J.P. Morgan as part of its review of the Round Two bids.
- (g) Provide copies of the notes, minutes, summaries, and reports of the meetings at which J.P. Morgan reviewed the Round Two bids. Also provide copies of the presentations made at and the documents circulated or distributed at any of these meetings.

Response:

- (a) Please note that there was not a non-binding or indicative round of bidding in the Vermont Yankee auction process.
- (b) Please note that there was not a non-binding or indicative round of bidding in the Vermont Yankee auction process.
- (c) Please note that there was not a non-binding or indicative round of bidding in the Vermont Yankee auction process.
- (d) Please note that there was one, not two, due diligence periods in the VY auction process. Bidders were not required to submit to JPMorgan their due diligence reviews.
- (e) There were no Round Two bids as such but please see the attachments to the response to AG IR1-3.
- (f) There were no Round Two bids as such but please see the attachments to the responses to AG IR1-18e and 1-4.
- (g) Please see the attached responses which are confidential and are being provided only to the signatories of WMECO's Nondisclosure Agreement. Please also see the Review of Offers for Vermont Yankee by J.P. Morgan dated July 30, 2001 provided in response to AG IR1-4.

* This material is being provided to the signatories of the non-disclosure agreement only.